Environmental Compliance Team

Environmental Compliance Team

The Environmental Compliance Team is responsible for ensuring the establishment of an overall Environmental Compliance Program at ANL. At this time, DOE requires that the Environmental Compliance Program be part of an Integrated Safety Management Program that is established at all its Laboratories. Support in implementing the Environmental Compliance Program comes from all of the AAO organizations.

AAO Objectives assigned to the Environmental Compliance Team

- 1) Provide DOE line management oversight of ANL operations and facilities as part of the DOE-CH facility management business line
- 3) Provide line management responsibility for the protection of the public, workers, and the environment from work performed at ANL
- 4) Foster and maintain an environment that is conducive to conducting costeffective, world-class research and science

AAO Key Responsibilities assigned to the Environmental Compliance Team

2) ES&H oversight and operational awareness

Additional, more detailed responsibilities that are carried out by the Environmental Compliance Team are:

- 1) Maintain technical mission operational knowledge of work and facilities
- 2) Review regulations, DOE Orders, Policy
- 3) Identify and provide relevant guidance to the Contractor for safety, health and environmental matters
- 4) Develop contract requirements including objectives, measures, and expectations
- 5) Determine ANL compliance with regulations, DOE Orders, and DOE policy
- 6) Review ANL Tier 1 and 2 documents and some Tier 3 documents such as the Integrated Safety Management Plan, ESH Manual, Quality Assurance Plan and others
- 7) Review and report on ANL annual self-assessment including the overall ES&H rating
- 8) Perform a yearly assessment of ANL's ES&H performance for the DOE-AAO Group Manager
- 9) Conduct systematic assessments of ES&H programs and processes
- 10) Follow-up on occurrences
- 11) Perform for cause reviews as appropriate for injuries, illnesses, accidents, occurrences, releases and/or complaints
- 12) Monitor, audit and evaluate contractor environment, safety and health management structure
- 13) Develop and maintain standard operating procedures for AAO
- 14) Exercise stop-work authority when necessary
- 15) Review and recommend approval of the contractor's ESH&I prioritization

- 16) Monitor completion of corrective actions taken by ANL to eliminate deficiencies identified through self-assessments, investigations of accidents, incidents, occurrences, external compliance inspections, injuries or illnesses.
- 17) Maintain tracking systems for DOE-AAO commitments, DOE-wide S&H issues, deliverables to environmental regulatory agencies, and AAO NEPA actions.
- 18) Review and prepare NEPA documentation and recommend NEPA determinations
- 19) Coordinate preparation of environmental permit applications and maintenance of permits

AAO Functions assigned to the Environmental Compliance Team

- 1) Serve as the facility owner and oversee the facility operations
- 2) Provide DOE line management oversight for ANL
- 6) Determine applicability of DOE policies and issue direction/guidance
- 7) Develop and maintain an ES&H program; oversee ANL ES&H Program; perform ongoing validation of the ANL ISM Program
- 9) Maintain effective working relationships and communication with DOE-HQ, other DOE-CH groups, ANL, The University of Chicago and appropriate federal, state and local regulatory agencies
- 10) Conduct community stakeholder and media relations
- 11) Promote world-class research in a safe work environment
- 12) Develop appropriate tools and techniques (e.g. Standard operating procedures) to successfully accomplish assigned mission elements
- 13) Evaluate ANL performance and provide periodic feedback and, if necessary, direction to ANL and the University of Chicago concerning ANL performance

Customer Expectations assigned to the Environmental Compliance Team

3) ES&H – ensure the safety and health of the workforce and members of the public and the protection of the environment in all program activities.

Overall AAO FY-01 Business Plan Objectives assigned to the Environmental Compliance Team

ES&H Expectations:

- 1. AAO will continue to work with ANL to ensure that the ISM Program is maintained and enhanced.
- AAO will maintain operational awareness of ANL facilities and operations as defined in the AAO Operational Awareness and Direction Program Description.

FY-01 ANL Contract Performance Measures assigned to the Environmental Compliance Team

Performance Measures

1. Environment, Safety and Health (II.2)

System Assessment Measures

1. Environment, Safety and Health (III.1)

FY-01 Team Performance Goals

Performance Area: Environment, Safety, and Health (ES&H)

Performance Objective: Improve Argonne-East habitat by completing a mitigation

wetland restoration project.

Owner: Team Leader for Environmental Compliance

Assumptions: Restored wetland will resolve U.S. Army Corps of Engineers concerns regarding construction of the Advanced Photon Source, provide compensatory mitigation for future projects at Argonne-East, and increase biodiversity.

Success Measures: Complete wetland management environmental assessment by July 2001. Remove drain tiles from the mitigation area and introduce appropriate vegetation by October 2001. Achieve by October 2003 a net increase of at least three acres of wetland with a mean index of conservatism of 3.5.

Performance Area: Environment, Safety, and Health (ES&H)

Performance Objective: Clarify and streamline AAO compliance with the National

Historic Preservation Act (NHPA).

Owner: Team Leader for Environmental Compliance

Assumptions: AAO will enter into a programmatic agreement with the Illinois Historic Preservation Agency and the Advisory Council on Historic Preservation to streamline compliance with the NHPA and guide completion of our Cultural Resource Management Plan.

Success Measures: AAO will submit a programmatic agreement to the Illinois Historic Preservation Agency by March 2001. AAO will seek public comment on our draft Cultural Resource Management Plan by October 2001.

Performance Area: Environment, Safety, and Health (ES&H)

Performance Objective: Verify that the ANL Integrated Safety Management System is maintained.

Owner: AAO Team Leaders for E and S&H

Assumptions: AAO will conduct regularly scheduled performance reviews of targeted

ES&H areas.

Success Measures: Complete by the end of September 2001, seven program reviews scheduled for the period January through September 2001. Complete annual review of the ISM program per DOE G. 450.4-1A during contract self-assessment process.

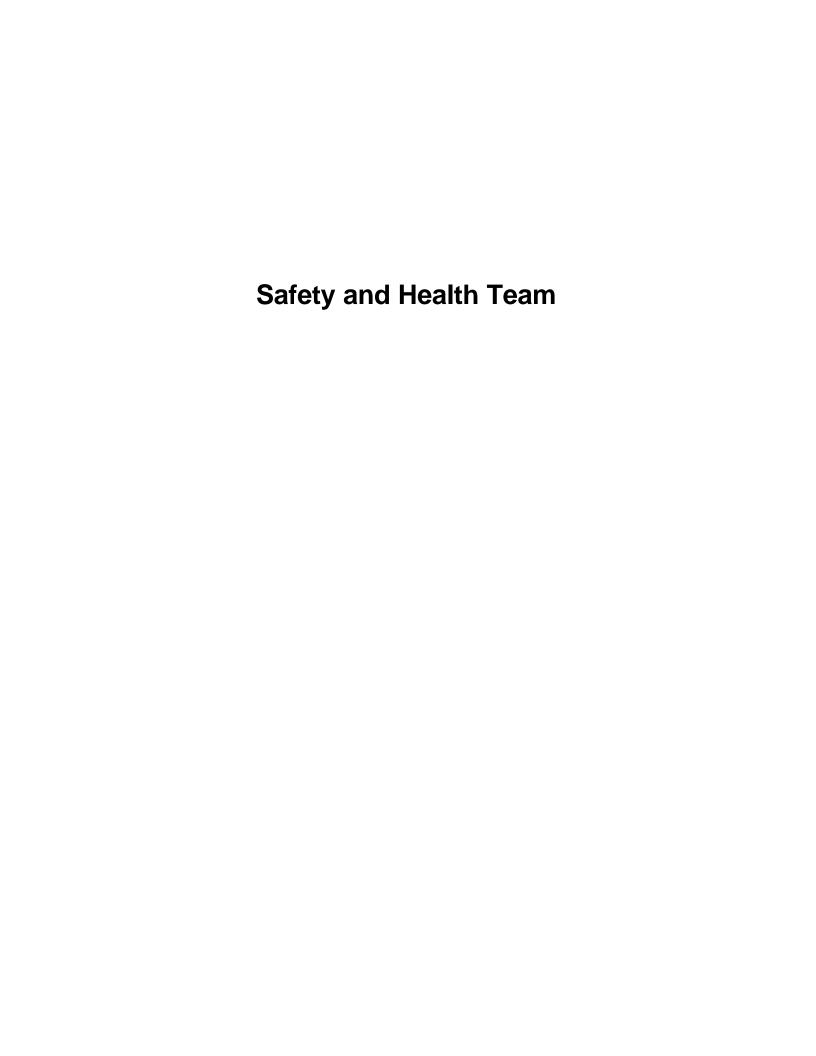
Performance Area: Environment, Safety, and Health (ES&H)

Performance Objective: Use contract performance measures to maintain and improve ANL Integrated Safety Management System.

Owner: DOE-AAO Team Leaders for É and S&H

Assumptions: AAO will maintain an ongoing dialog with ANL to assess performance under existing measures and develop measures for future performance periods.

Success Measures: AAO ES&H Teams meet at least once per quarter with ANL ES&H counterparts to discuss performance measures and develop draft FY 02 measures by June 2001.



Safety and Health Team

The Safety and Health Team is responsible for ensuring the establishment of an overall Safety and Health Program at ANL. DOE requires that an Integrated Safety Management Program be established at all its Laboratories. Support in implementing this ISM program comes from all of the AAO organizations.

AAO Objectives assigned to the Safety and Health Team

- 1) Provide DOE line management oversight of ANL operations and facilities as part of the DOE-CH facility management business line
- 3) Provide line management responsibility for the protection of the public, workers, and the environment from work performed at ANL
- 4) Foster and maintain an environment that is conducive to conducting costeffective, world-class research and development

AAO Key Responsibilities assigned to the Safety and Health Team

2) ES&H oversight and operational awareness

Additional, more detailed responsibilities that are carried out by the Safety and Health Team

- 1) Maintain technical mission operational knowledge of work and facilities
- 2) Review regulations, DOE Orders, Policy
- 3) Identify and provide relevant guidance to the Contractor for safety, health and environmental matters
- 4) Develop contract requirements including objectives, measures, and expectations
- 5) Determine ANL compliance with regulations, DOE Orders, and DOE policy
- 6) Review ANL Tier 1 and 2 documents and some Tier 3 documents such as the Integrated Safety Management Plan, ESH Manual, Quality Assurance Plan and others
- Review and report on ANL annual self-assessment including the overall ES&H rating
- 8) Perform a yearly assessment of ANL's ES&H performance for the DOE-AAO Group Manager
- 9) Conduct systematic assessments of ES&H programs and processes
- 10) Follow-up on occurrences (SOP-4)
- 11) Perform for cause reviews as appropriate for injuries, illnesses, accidents, occurrences, releases and/or complaints
- 12) Monitor, audit and evaluate contractor environment, safety and health management structure
- 13) Develop and maintain standard operating procedures for AAO (SOP-1)
- 14) Exercise stop-work authority when necessary (SOP-16)
- 15) Review and recommend approval of the contractor's ESH&I prioritization (SOP-12)
- 16) Monitor completion of corrective actions taken by ANL to eliminate deficiencies identified through self-assessments, investigations of accidents, incidents,

- occurrences, AAO ES&H Program Reviews, external compliance inspections, injuries or illnesses, etc.
- 17) Maintain tracking systems for AAO commitments, DOE-wide S&H issues, deliverables to environmental regulatory agencies, and AAO ES&H Program Reviews and NEPA actions.
- 18) Perform operational awareness including observations, walkthroughs and surveillances at ANL facilities through the Facility Representative Program (SOP-26)
- 19) Serve as the primary point of contact in facilities for DOE
- 20) Evaluate, review, and concur/approve of safety documentation and authorization basis including but not limited to facility hazard categorization, safety analysis reports, technical safety requirements, criticality hazard control statements, and unreviewed safety question determinations (SOP-7)
- 21) Review and approve the Laboratory hazard assessment and emergency management plans
- 22) Review and/or approve safety assessment documents (SOP-15)
- 23) Review and/or participate in operational readiness reviews and accelerator safety reviews (SOP-9)
- 24) Confirm readiness for operation (SOP-9)
- 25) Serve as Price Anderson Amendments Act Coordinator (SOP-21)
- 26) Participate in emergency preparedness program with the contract and serve as the point of contact with DOE-HQ on these matters (SOP-6)

AAO Functions assigned to the Safety and Health Team

- 1) Serve as the facility owner
- 2) Provide DOE line management oversight for ANL facilities and activities
- 6) Determine applicability of DOE policies and issue direction/guidance
- 7) Develop and maintain an ES&H program; oversee ANL ES&H Program; perform ongoing validation of the ANL ISM Program
- 9) Maintain effective working relationships and communication with DOE-HQ, other DOE-CH groups, ANL, the University of Chicago, and appropriate federal, state, county, and local agencies, including regulators
- 11) Promote world-class research in a safe work environment
- 12) Develop appropriate tools and techniques (e.g. Standard operating procedures) to successfully accomplish assigned mission elements
- 13) Evaluate ANL performance and provide periodic feedback and, if necessary, direction to ANL and the University of Chicago concerning ANL performance

Customer Expectations assigned to the Safety and Health Team

3) ES&H – ensure the safety and health of the workforce and members of the public and the protection of the environment in all program activities.

Overall AAO FY-01 Business Plan Objectives assigned to the Safety and Health Team

ES&H Expectations:

1) AAO will continue to work with ANL to ensure that the ISM Program is maintained and enhanced.

- 2) AAO will work with ANL to ensure that the Price Anderson issues are resolved and performance improves.
- 3) AAO will maintain operational awareness of ANL facilities and operations as defined in the AAO Operational Awareness and Direction Program Description.
- 4) AAO will continue to improve and enhance its Facility Representative Program.

FY-01 ANL Contract Performance Measures assigned to the Safety and Health Team

Performance Measures

1. Environment, Safety and Health (II.2)

System Assessment Measures

1. Environment, Safety and Health (III.1)

FY-01 Team Performance Goals

Performance Area: Environment, Safety, & Health (ES&H)

Performance Objective: AAO has sufficient, qualified Facility Representatives.

Owner: AAO Team Leader for S&H

Assumptions: AAO will qualify two facility representatives at AAO-W. AAO is required to initiate re-certification of its facility representatives on a three-year cycle. Two other facility representatives began re-certification in FY-2000. This performance objective assumes that all training/testing materials are available.

Success Measures:

- Certify the two new AAO facility representatives by August 2001.
- Finish re-certifying the two AAO facility representatives by April 2001.

Performance Area: Environment, Safety, & Health (ES&H)

Performance Objective: The AAO Facility Representative Program is evaluated and maintained to meet or exceed the Standard.

Owner: AAO Team Leader for S&H

Assumptions: AAO performs a self-assessment of its Facility Representative Program on a three year cycle to identify any issues and initiate corrective actions. This selfassessment is to be used for continuous improvement of the Facility Representative Program.

Success Measure: Complete a plan of Program improvements based on AAO Facility Representative Program self-assessment results by May 2001, including improvements to the facility representative surveillance process.

Performance Area: Environment, Safety, & Health (ES&H)

Performance Objective: ANL achieves a continuously improving Price Anderson

Amendments Act (PAAA) program.

Owner: AAO Team Leader for S&H and AAO PAAA Coordinator

Assumptions: Public comments result in no substantive changes affecting implementation of revised Part 830 interim final rule.

Success Measures:

Verification of corrective actions from Notice of Violation (EA 1999-10) is completed

- Assess improvements to ANL PAAA Program via ESH Program Review in FY2001.
- AAO concurs on ANL's demonstrated compliance with revised Part 830 prior to implementation deadline.

Performance Area: Environment, Safety, & Health (ES&H)

Performance Objective: AAO and ANL have adequate Emergency Preparedness.

Owner: AAO Team Leader for S&H

Assumptions: NBL participates on the planned FY2001 sitewide exercise. **Success Measures:**

- Complete a sitewide emergency exercise in FY 2001 with NBL and ANL.
- Evaluate ANL Emergency preparedness via an ESH Program Review by July 2001.

Participate in sheltering and evacuation drills

Performance Area: Environment, Safety, and Health (ES&H)

Performance Objective: Verify that the ANL Integrated Safety Management System is maintained.

Owner: AAO Team Leaders for E and S&H

Assumptions: AAO will conduct regularly scheduled performance reviews of targeted ES&H areas.

Success Measures: Complete by the end of September 2001, seven program reviews scheduled for the period January through September 2001. Complete annual review of the ISM program per DOE G. 450.4-1A during contract self-assessment process.

Performance Area: Environment, Safety, and Health (ES&H)

Performance Objective: Use contract performance measures to maintain and improve ANL Integrated Safety Management System.

Owner: DOE-AAO Team Leaders for E and S&H

Assumptions: AAO will maintain an ongoing dialog with ANL to assess performance under existing measures and develop measures for future performance periods.

Success Measures: AAO ES&H Teams meet at least once per quarter with ANL ES&H counterparts to discuss performance measures and develop draft FY 02 measures by June 2001.